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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re

RICHARD TOM, a/k/a Rich Tom

Debtor.

SSN: XXX-XX-8585

Case No. 19-31024 HLB

Chapter 7

A.P. No. 19-03065

**LORAIN WONG, KENDALL NG and
MARK NG**

Plaintiffs.

vs.

RICHARD TOM,

Defendant

**THIRD STIPULATION TO EXTEND
FACT DISCOVERY DEADLINES**

Place: Telephonic/ Videoconference
Courtroom 19

450 Golden Gate Avenue

16th Floor

San Francisco, CA

Judge: Hon. Hannah L. Blumenstiel

1 This stipulation is entered into by and between Defendant RICHARD TOM (“Defendant”),
2 by and through counsel, on one hand, and LORAIN WONG, KENDALL NG, and MARK NG
3 (“Plaintiffs”) by and through counsel, on the other (collectively “the Parties”).

4 **RECITALS**

5
6 A. On September 21, 2021, the Court entered its *Order Approving Amended Stipulation to*
7 *Extend Discovery Deadlines* (dkt. 31), setting, *inter alia*, discovery deadlines as follows:

8 DATE AND TIME OF TRIAL:	TBD
9 TIME RESERVED FOR TRIAL:	TBD
10 FACT DISCOVERY DEADLINE:	December 1, 2021
11 DISPOSITIVE MOTION DEADLINE:	February 3, 2022
12 EXPERT DISCLOSURES:	February 3, 2022
13 REBUTTAL EXPERT DISCLOSURES:	March 7, 2022
14 EXPERT DISCOVERY DEADLINE:	April 4, 2022
15 PRE-TRIAL CONFERENCE:	April 21, 2022; 2:00 p.m.
16 OTHER PROVISIONS:	The parties shall complete some form of alternative dispute resolution no later than February 3, 2022.

17 B. The Parties hereby agree, for good cause demonstrated, to extend the fact discovery by
18 30 days, to December 31, 2021.

19 C. The Parties do not seek at this time to amend any other deadline previously ordered by
20 the Court.

21
22 NOW THEREFORE, in light of the foregoing, the Parties agree and stipulate as follows:

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25 ///

STIPULATION

1. The September 21, 2021 Order Approving Amended Stipulation to Extend Discovery Deadlines is hereby AMENDED as follows:

DATE AND TIME OF TRIAL:	TBD
TIME RESERVED FOR TRIAL:	TBD
FACT DISCOVERY DEADLINE:	December 31, 2021
DISPOSITIVE MOTION DEADLINE:	February 3, 2022
EXPERT DISCLOSURES:	February 3, 2022
REBUTTAL EXPERT DISCLOSURES:	March 7, 2022
EXPERT DISCOVERY DEADLINE:	April 4, 2022
PRE-TRIAL CONFERENCE:	April 21, 2022; 2:00 p.m.
OTHER PROVISIONS:	The parties shall complete some form of alternative dispute resolution no later than February 3, 2022.

IT IS SO STIPULATED.

Dated: November 11, 2021

BELVEDERE LEGAL, PC

By: /s/ Matthew D. Metzger
Matthew D. Metzger
Attorney for Defendant Richard Tom

Dated: November 11, 2021

DIEMER & WEI, LLP

/s/ Kathryn S. Diemer
Kathryn S. Diemer
Attorneys for Plaintiffs

1 **CERTIFICATE OF SERVICE**

2 I, Matthew D. Metzger, the undersigned, hereby declare:

3 I am the attorney for RICHARD TOM, defendant in the above-captioned Adversary
4 Proceeding No. 19-03065 HLB, with offices at Belvedere Legal, PC, 1777 Borel Place, Suite 314,
5 San Mateo, CA 94402.

6 On November 11, 2021 I caused to be served true copies of **THIRD STIPULATION TO**
7 **EXTEND FACT DISCOVERY DEADLINES** on the following individuals and entities that have
8 consented to receive service via email, as follows:

9

Name	Email Address
Russell Robinson	rlaw345@gmail.com
Kathryn S. Diemer	kdiemer@diemerwhitman.com
Susan B. Luce	sluce@diemerwei.com
Paul Johnson	pjohnson@diemerwei.com

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15
16 I declare under penalty of perjury under the laws of the United States of America that the
17 foregoing is true and correct.

18 Executed on November 11, 2021 at San Mateo, California.

19
20 /s/ Matthew D. Metzger
Matthew D. Metzger
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